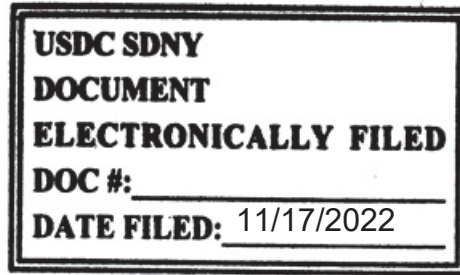




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November 16, 2022



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VIA ECF

The Honorable Robert W. Lehrburger
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *Hedgeye Risk Management, LLC v. Dale*, No. 1:21-cv-3687 (ALC)
Request to Seal Documents

Dear Judge Lehrburger:

We represent Hedgeye Risk Management, LLC (“Hedgeye”) in the above captioned matter. We write to request that the following documents be filed under seal:

- Hedgeye’s Letter Motion to Compel Dated November 16, 2022
- Exhibit B to Hedgeye’s Letter Motion to Compel Dated November 16, 2022
- Exhibit C to Hedgeye’s Letter Motion to Compel Dated November 16, 2022

Pursuant to the Stipulated Confidentiality Agreement and Protective Order between the Parties (Dkt. 45), all Confidential Discovery Material must be filed with the Court under seal. Exhibit B contains relevant portions of 42 Macro, LLC’s Operating Agreement, which has been designated by Defendants as “Highly Confidential – Attorney’s Eyes Only.” Exhibit C contains relevant portions of the deposition transcript of Collin de Rham, portions of which were designated on the record as “Highly Confidential – Attorney’s Eyes Only.” Until the Parties can resolve exactly which portions are Confidential, Hedgeye filed the entirety of the transcript under seal, along with this letter motion that references and describes the testimony.

Thank you for your consideration.

Respectfully submitted,

Thomas E. Wallerstein

Application granted.

SO ORDERED:

11/17/2022

HON. ROBERT W. LEHRBURGER
UNITED STATES MAGISTRATE JUDGE